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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOHN PETERSON, individually,

Plaintiff,

vs.

UNITED FINANCIAL CASUALTY COMPANY, a
foreign corporation; DOES I-V; and ROE
CORPORATIONS VI-X, inclusive,

Defendants.

EIGHTH JUDICIAL DISTRICT COURT CASE
NO.: A-22-856863-C

PETITION FOR REMOVAL

TO: CLERK OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA; and

TO: ALL INTERESTED PARTIES:

Defendant United Financial Casualty Company (“United Financial”), by and through its attorneys, KEATING LAW GROUP, files this Petition for Removal of Civil Action of the above-entitled case from the Eighth Judicial District Court for the State of Nevada to the United States District Court for the District of Nevada, on the basis of diversity of citizens pursuant to 28 U.S.C.A. §1441 and §1446.

The Petition of Defendant respectfully shows:

1. On August 12, 2022, Plaintiff commenced his lawsuit against Defendant in the Eighth Judicial District Court for the State of Nevada, entitled *John Peterson vs. United Financial Casualty Company*, Case No. A-22-856863-C.

2. On or about August 19, 2022, Defendant received notice of this action by service of process pursuant to the affidavit of service indicating that United Financial was served through the Nevada Division of Insurance.

3. Plaintiff JOHN PETERSON is a citizen of Nevada.

4. Defendant is an Ohio corporation.

5. Plaintiff, in his Complaint, is seeking compensatory damages for: (1) breach of contract; (2); fraudulent and intentional misrepresentation; (3) breach of the contractual covenant of good faith and fair dealing – bad faith; and (4) breach of tortious covenant of good faith and fair dealing – bad faith.

6. Plaintiff has obtained a judicial assignment and is seeking to collect on a judgment in the amount of \$7,506,972.85

7. This is a civil action over which this Court has jurisdiction and is one that may be removed to this Court by Defendant.

8. Copies of all processes and pleadings served in the State Court action are attached as **Exhibit “A”** to the Petition for Removal in accordance with 28 U.S.C.A. § 1446(a).

9. Concurrent with the filing of this Petition for Removal, Defendant is providing Notice to all parties and the Clerk of the Eighth Judicial District Court, Clark County, Nevada, pursuant to 28 U.S.C.A. §1446(d).

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1 WHEREFORE, Defendant United Financial gives notice that the above-entitled action,
2 pending in the Eighth Judicial District Court for the State of Nevada, is being removed
3 therefrom to this Honorable Court.

4 DATED this 12th day of September 2022.

5 KEATING LAW GROUP

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7 /s/John T. Keating

8 John T. Keating
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12 Attorney for Defendant
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